

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

In re:)	Case No. 24-80617
)	(Chapter 11)
C M HEAVY MACHINERY, LLC)	
)	
Debtor.)	
_____)	

NOTICE REGARDING CLOSING ARGUMENT

At the close of a hearing on Creditor Great Plains National Bank's Motion to Dismiss, or Alternatively, to Convert the Bankruptcy Case to a Chapter 7 Proceeding, DE #82, the parties agreed to submit written closing arguments, with this Honorable Court directing such should be submitted within ten days of receipt of the hearing transcript. *See* Transcript, DE #163 at 239:15-19. Previously unbeknownst to the debtor, it appears the parties ultimately then received the hearing transcript on different days, with the transcript being conveyed to counsel for the debtor on April 21, 2025 and with counsel, accordingly, penciling in a May 1, 2025 date for the docketing of the closing argument. The anomaly became evident late yesterday, when counsel for the bank docketed a closing, having received the transcript on April 18, 2025.

Undersigned counsel has conversed with counsel for the bank and informally represented that neither of the debtor's lawyers will read the bank's closing until such a time as the debtor's closing is docketed. An effort will be made to expedite preparation of the debtor's closing, in the interim, though certain logistical eccentricities—wholly unrelated to this case—make it unlikely the closing will be docketed before Thursday, May 1, 2025.

This notice is shared to (i) offer assurances the debtor still intends to file a written closing; and (ii) memorialize, more formally, the representation made to the bank's counsel concerning the debtor's attorneys forbearing from reviewing the bank's closing until such a time as the debtor's

closing is docketed.

Respectfully Submitted,

Dated: April 29, 2025

By: /s/ Maurice B. VerStandig
Maurice B. VerStandig, Esq.
The VerStandig Law Firm, LLC
9812 Falls Road, #114-160
Potomac, Maryland 20854
Phone: (301) 444-4600
mac@mbvesq.com

Christianna A. Cathcart, Esq.
The VerStandig Law Firm, LLC
9812 Falls Road, #114-160
Potomac, Maryland 20854
Phone: (301) 444-4600
christianna@dakotabankruptcy.com

Counsel for the Debtor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of April, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig
Maurice B. VerStandig